

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ILLINOIS COMMERCE COMMISSION,	:	
On Its Own Motion,	:	
	:	No. 03-0056
Proceeding to monitor the ongoing development	:	
of the marketplace for Commonwealth Edison :	:	
Company	:	

PETITION FOR LEAVE TO INTERVENE

COME NOW Abbott Laboratories, Inc., Caterpillar Inc., Daimler Chrysler Corporation, Ford Motor Company, A. Finkl & Sons, General Motors Corporation, Modern Drop Forge Company, and BP Amoco as the Illinois Industrial Energy Consumers, and for their Petition for Leave to Intervene in the above entitled matter, state as follows:

1. The Petitioners are authorized to do business in the State of Illinois and operate manufacturing and industrial plants in the State of Illinois.
2. The Petitioners are substantial users of energy with demands of 3 MW or more, within the Commonwealth Edison Company (ComEd) service territory.
3. The Petitioners will be substantially affected by the market monitoring proposed in this proceeding.

WHEREFORE, Petitioners pray they be granted leave to intervene, and become parties to the above styled proceeding for the purpose of submitting evidence and cross-examining witnesses

and with the right to file appropriate briefs and pleadings, participate in oral argument and participate in any other proceedings arising out of this docket, before this Commission, should oral argument be granted.

Dated this _____ day of February, 2003.

Eric Robertson
Lueders, Robertson & Konzen
1939 Delmar Avenue - P.O. Box 735
Granite City, IL 62040
(618) 876-8500

40513.1

PROOF OF SERVICE

STATE OF ILLINOIS :

: SS

COUNTY OF MADISON :

I, Eric Robertson., being an attorney admitted to practice in the State of Illinois and one of the attorneys for Illinois Industrial Energy Consumers herewith certify that I did on the _____ day of February, 2003, electronically file with the Illinois Commerce Commission a Petition for Leave to Intervene on behalf of Abbott Laboratories, Inc., et al., as the Illinois Industrial Energy Consumers, and electronically serve upon the persons identified on the attached service list.

Eric Robertson
Lueders, Robertson & Konzen
1939 Delmar Avenue
P. O. Box 735
Granite City, IL 62040
(618) 876-8500

SUBSCRIBED AND SWORN to me, a Notary Public, on this _____ day of February, 2002.

Notary Public

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

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On Its Own Motion,	:	
	:	No. 03-0056
Proceeding to monitor the ongoing development	:	
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NOTICE OF FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on this _____ day of February, 2003, we have electronically filed with the Illinois Commerce Commission, 527 East Capitol Ave., Springfield, Illinois, 62794, a Petition for Leave to Intervene filed on behalf of Abbott Laboratories, Inc., et al., as the Illinois Industrial Energy Consumers, along with Proof of Service thereon attached.

Eric Robertson
Lueders, Robertson & Konzen
1939 Delmar Avenue
P. O. Box 735
Granite City, IL 62040
(618) 876-8500

STATE OF ILLINOIS, :
 :
COUNTY OF MADISON, :
 :

SS

VERIFICATION

I, Eric Robertson, being duly sworn, depose and state that I have read the foregoing Petition for Leave to Intervene on behalf of Abbott Laboratories, Inc., et a., as the Illinois Industrial Energy Consumers, and state the contents therein are true and accurate to the best of my belief and knowledge.

Eric Robertson
Lueders, Robertson & Konzen
1939 Delmar Avenue
P. O. Box 735
Granite City, IL 62040
618-876-8500

SUBSCRIBED AND SWORN to before me, a Notary Public on this _____ day of
February, 2003.

_____,
Notary Public

ICC DOCKET NO. 03-0056

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